

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

OPEN SOCIETY JUSTICE INITIATIVE,

Plaintiff,

vs.

OFFICE OF THE DIRECTOR OF NATIONAL
INTELLIGENCE,

Defendant.

CASE NO. 1:20-CV-06625-PAE
JUDGE PAUL A. ENGELMAYER

**DECLARATION OF AMIT B. PATEL IN SUPPORT OF
BRIEF OF DEMOCRACY FOR THE ARAB WORLD NOW AS *AMICUS CURIAE***

I, Amit B. Patel, hereby declare:

1. I am an attorney with the law firm of Jenner & Block LLP, counsel for Democracy for the Arab World Now (“DAWN”).

2. I submit this declaration in support of the brief of DAWN as *amicus curiae*.

3. The statements made in this declaration are based on my personal knowledge.

4. Attached hereto as Exhibit 1 is a true and correct copy of Kate Sullivan & Zachary Cohen, *Senate Dem on Armed Services panel: Trump lying about CIA report on Khashoggi*, CNN (Nov. 23, 2018), <https://edition.cnn.com/2018/11/23/politics/senate-dem-armed-services-cia-khashoggi/index.html>.

5. Attached hereto as Exhibit 2 is a true and correct copy of Statement from President Donald J. Trump on Standing with Saudi Arabia (Nov. 20, 2018), <https://www.whitehouse.gov/briefings-statements/statement-president-donald-j-trump-standing-saudi-arabia/>.

6. Attached hereto as Exhibit 3 is a true and correct copy of Sonam Sheth and John Haltiwanger, *‘I saved his a—’: Trump boasted that he protected Saudi Crown Prince Mohammed*

bin Salman after Jamal Khashoggi's brutal murder, Woodward's new book says, Business Insider (Sep. 10, 2020), <https://www.businessinsider.com/trump-woodward-i-saved-his-ass-mbs-khashoggi-rage-2020-9>.

7. Attached hereto as Exhibit 4 is a true and correct copy of President Trump's full, unedited interview with Meet the Press, NBC (Jun. 23, 2019), <https://www.nbcnews.com/politics/meet-the-press/president-trump-s-full-unedited-interview-meet-press-n1020731>.

8. Attached hereto as Exhibit 5 is a true and correct copy of Noah Bookbinder, *President Trump has a massive conflict of interest on Saudi Arabia*, Washington Post (Oct. 18, 2018), <https://www.washingtonpost.com/outlook/2018/10/18/president-trump-has-massive-conflict-interest-saudi-arabia/>.

9. Attached hereto as Exhibit 6 is a true and correct copy of Anna Massoglia and Karl Evers-Hillstrom, *World of Influence: A guide to Trump's foreign business interests*, Open Secrets (Jun. 4, 2019), <https://www.opensecrets.org/news/2019/06/trump-foreign-business-interests/>.

10. Attached hereto as Exhibit 7 is a true and correct copy of David A. Fahrenthold and Jonathan O'Connell, *At President Trump's hotel in New York, revenue went up this spring — thanks to a visit from big-spending Saudis*, Washington Post (Aug. 3, 2018), https://www.washingtonpost.com/politics/at-president-trumps-hotel-in-new-york-revenue-went-up-this-spring--thanks-to-a-visit-from-big-spending-saudis/2018/08/03/58755392-9112-11e8-bcd5-9d911c784c38_story.html.

11. Attached hereto as Exhibit 8 is a true and correct copy of David A. Fahrenthold, Jonathan O'Connell, and Morgan Krakow, *At Trump's big-city hotels, business dropped as his political star rose, internal documents show*, Washington Post (Oct. 4, 2018), <https://www.washingtonpost.com/politics/at-trumps-big-city-hotels-business-dropped-as-his->

political-star-rose-internal-documents-show/2018/10/03/bd26b1d6-b6d4-11e8-a7b5-adaaa5b2a57f_story.html.

12. Attached hereto as Exhibit 9 is a true and correct copy of David D. Kirkpatrick, Ben Hubbard, Mark Landler, and Mark Mazzetti, *The Wooing of Jared Kushner: How the Saudis Got a Friend in the White House*, N.Y. Times (Dec. 8, 2018), <https://www.nytimes.com/2018/12/08/world/middleeast/saudi-mbs-jared-kushner.html>.

13. Attached hereto as Exhibit 10 is a true and correct copy of Bill Powell, *Exclusive: Jared Kushner Gets Candid About Struggling Trump Campaign, Mideast Peace, More*, Newsweek (Jul. 20, 2020), <https://www.newsweek.com/2020/07/24/exclusive-jared-kushner-gets-candid-about-struggling-trump-campaign-mideast-peace-more-1518952.html>.

14. Attached hereto as Exhibit 11 is a true and correct copy of Carol D. Leonnig, Shane Harris, Josh Dawsey and Greg Jaffe, *How Jared Kushner forged a bond with the Saudi crown prince*, Washington Post (Mar. 3, 2018), https://www.washingtonpost.com/politics/how-jared-kushner-forged-a-bond-with-the-saudi-crown-prince/2018/03/19/2f2ce398-2181-11e8-badd-7c9f29a55815_story.html.

15. Attached hereto as Exhibit 12 is a true and correct copy of Erin Durkin, *Jared Kushner using WhatsApp to speak to foreign contacts, top Democrat says*, The Guardian (Mar. 21, 2019), <https://www.theguardian.com/us-news/2019/mar/21/jared-kushner-whatsapp-house-oversight-information>.

16. Attached hereto as Exhibit 13 is a true and correct copy of David Ignatius, *The Saudi crown prince just made a very risky power play*, Washington Post (Nov. 5, 2017), https://www.washingtonpost.com/opinions/global-opinions/the-saudi-crown-princes-risky-power-play/2017/11/05/4b12fcf0-c272-11e7-afe9-4f60b5a6c4a0_story.html.

17. Attached hereto as Exhibit 14 is a true and correct copy of Abigail Tracy, *"It Looks Bad. It Smells Bad. It Is Bad": Democrats Are Digging Into Kushner's Cozy Relationship With M.B.S.*, Vanity Fair (Apr. 11, 2019), <https://www.vanityfair.com/news/2019/04/democrats-probe-jared-kushner-relationship-with-mbs>.

18. Attached hereto as Exhibit 15 is a true and correct copy of Mohamad Bazzi, *The heart of the US-Saudi relationship lies in the Kushner-prince friendship*, The Guardian (Mar. 10, 2019), <https://www.theguardian.com/commentisfree/2019/mar/10/us-saudi-arabia-trump-kushner-mohammed-bin-salman>.

19. Attached hereto as Exhibit 16 is a true and correct copy of Jacqueline Alemany, *Power Up: Jared Kushner's Middle East diplomacy could help him after he leaves the White House*, Washington Post (Dec. 3, 2020), <https://www.washingtonpost.com/politics/2020/12/03/power-up-jared-kushners-middle-east-diplomacy-could-help-him-after-he-leaves-white-house/>.

20. Attached hereto as Exhibit 17 is a true and correct copy of Olivia Gazis, *Lawmakers push for declassification of intelligence on Khashoggi murder*, CBS News (Mar. 3, 2020), <https://www.cbsnews.com/news/jamal-khashoggi-declassification-intelligence-saudi-dissident-murder/>.

21. Attached hereto as Exhibit 18 is a true and correct copy of Ellen Nakashima, *Lawmakers want the DNI to make public the intelligence community's assessment of who's responsible for killing Jamal Khashoggi*, Washington Post (Mar. 3, 2020), https://www.washingtonpost.com/national-security/lawmakers-want-the-dni-to-make-public-the-intelligence-communitys-assessment-of-whos-responsible-for-killing-jamal-khashoggi/2020/03/03/aafa70ee-5d07-11ea-9055-5fa12981bbbf_story.html.

22. Attached hereto as Exhibit 19 is a true and correct copy of Press Release, Chairman of the Senate Comm. on Foreign Relations, Corker, Menendez, Graham, Leahy Letter Triggers Global Magnitsky Investigation Into Disappearance of Jamal Khashoggi (Oct. 10, 2018), <https://www.foreign.senate.gov/press/chair/release/corker-menendez-graham-leahy-letter-triggers-global-magnitsky-investigation-into-disappearance-of-jamal-khashoggi>.

23. Attached hereto as Exhibit 20 is a true and correct copy of Nicole Gaouette and Kevin Liptak, *White House refuses to meet Congress' deadline on Khashoggi killing*, CNN (Feb. 8, 2019), <https://www.cnn.com/2019/02/08/politics/white-house-khashoggi-deadline/index.html>.

24. Attached hereto as Exhibit 21 is a true and correct copy of United Nations, Office of the High Commissioner for Human Rights, Khashoggi killing: UN human rights expert says Saudi Arabia is responsible for “premeditated execution” (June 19, 2019), <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=24713>.

25. Attached hereto as Exhibit 22 is a true and correct copy of Anniversary of Jamal Khashoggi's Murder—Statement by Vice President Joe Biden (Oct. 2, 2020), <https://joebiden.com/2020/10/02/anniversary-of-jamal-khashoggis-murder-statement-by-vice-president-joe-biden/>.

26. Attached hereto as Exhibit 23 is a true and correct copy of Jamal Khashoggi, *Why the Arab World Needs Democracy Now*, N.Y. Times (Oct. 22, 2018), <https://www.nytimes.com/2018/10/22/opinion/khashoggi-mbs-arab-democracy.html>.

27. Attached hereto as Exhibit 24 is a true and correct copy of Jamal Khashoggi and Robert Lacey, *Britain once had a 'big stick', now the prime minister has little influence over Prince Mohammed bin Salman, and her only concern will be for Saudi Arabia's money*, The Guardian

(Mar. 6, 2018), <https://www.theguardian.com/commentisfree/2018/mar/06/crown-prince-saudis-theresa-may-britain-saudi-arabia-money>.

28. Attached hereto as Exhibit 25 is a true and correct copy of Jamal Khashoggi, *Saudi Arabia wasn't always this oppressive. Now it's unbearable*, Washington Post (Sep. 18, 2017), <https://www.washingtonpost.com/news/global-opinions/wp/2017/09/18/saudi-arabia-wasnt-always-this-repressive-now-its-unbearable/>.

29. Attached hereto as Exhibit 26 is a true and correct copy of Jamal Khashoggi, *Only democracy can stop the bloodshed*, Al-Arabiya (Jun. 12, 2016), <https://english.alarabiya.net/en/views/news/middle-east/2016/06/12/Only-democracy-can-stop-bloodshed.html>.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 13, 2021
Chicago, Illinois

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